

1 MARISA A. POCCI, ESQ.
Nevada Bar No. 10720
2 JAMIE S. HENDRICKSON, ESQ.
Nevada Bar No. 12770
3 **LITCHFIELD CAVO LLP**
4 3753 Howard Hughes Parkway, Suite 200
Las Vegas, Nevada 89169
5 Telephone: (702) 949-3100
Facsimile: (702) 916-1776
6 Email: Pocci@LitchfieldCavo.com
Hendrickson@LitchfieldCavo.com
7 *Attorneys for Defendant Technical Chemical Company*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10
11 ANGELA UNDERWOOD, Personal
12 Representative of the Estate of TYLER
UNDERWOOD,

13 Plaintiffs,
14 v.

15 O'REILLY AUTO ENTERPRISES, LLC d/b/a
O'Reilly Auto Parts, Inc., ILLINOIS TOOL
16 WORKS INC., Individually and as Successor in
Interest to Pennzoil Quaker State Company
17 d/b/a Gumout, THE BLASTER
CORPORATION, CRC INDUSTRIES, INC.,
SAFETY-KLEEN SYSTEMS, INC.,
18 HIGHLAND STORES, INC. d/b/a BiRight
Markets, BI-RITE MARKETS, INC.,
20 7-ELEVEN, INC., RICHARD A. HALEY,
AUTOZONE STORES, LLC, f/k/a Autozone
Stores, Inc., AMREP, INC., ADVANCE
22 STORES COMPANY, INCORPORATED,
Individually and as Successor in Interest to and
23 d/b/a CarQuest Auto Parts, ASHLAND, LLC,
Individually and as Successor in Interest to and
24 d/b/a Valvoline, CALUMET BRANDED
PRODUCTS, LLC f/k/a Calumet Packaging,
25 LLC, SUNNYSIDE CORPORATION, W.M.
BARR & COMPANY, INC., TECHNICAL
26 CHEMICAL COMPANY, RM MARKETS,
INC., CITGO PETROLEUM CORPORATION,
27 AND TOWER ENERGY,

28 Defendants.

Case No.: 2:21-cv-01766-GMN-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE REPLY
IN SUPPORT OF DEFENDANT
TECHNICAL CHEMICAL COMPANY'S
MOTION TO SET ASIDE CLERK'S
ENTRY OF DEFAULT (ECF No. 108)**

[FIRST REQUEST]

1 Pursuant to LR 6-1, the parties, through their respective undersigned counsel, do hereby move
2 for a order to stipulation and agree as follows:

3 1. On June 12, 2023, TCC filed its Motion to Set Aside Clerk's Entry of Default (ECF
4 No. 108) (the "Motion") (ECF No. 322).

5 2. Plaintiff filed her Answer to TCC's Motion to Set Aside Clerk's Entry of Default (ECF
6 No. 327) on June 26, 2023.

7 3. TCC's Reply is currently due July 3, 2023.

8 4. The current deadlines, pursuant to the Joint Stipulation for Limited Extension of
9 Certain Case Management Deadlines and proposed Order (Fourth Request) (ECF No. 304) are:
10 Discovery Cut-Off – September 6, 2023; Dispositive Motion Deadline: October 4, 2023 and Proposed
11 Pretrial Order due by November 3, 2023.

12 5. Plaintiff filed a Second Amended Complaint (ECF No. 302) on June, 1, 2023.

13 6. Due to the upcoming holiday, counsel for TCC requests a two week extension to allow
14 time to prepare and file its Reply.

15 7. Good cause exists for an extension due to the following reasons: (1) TCC's handling
16 defense counsel had a planned vacation and is celebrating his tenth wedding anniversary over the
17 holiday weekend; (2) TCC's handling defense counsel has several depositions and impending motion
18 deadlines in other matters that are concurrent with the instant Reply deadline; (3) TCC's handling
19 defense counsel's local Las Vegas office is suffering personnel shortages due to a new attorney that
20 previously accepted employment, provided a start date, and failed to meet that commitment.

21 8. Counsel for Plaintiff agreed to extend the deadline for TCC to file its Reply in support
22 of TTC's Motion (ECF No. 322) to and including Monday, July 17, 2023.

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1 9. TCC's Counsel has not previously obtained an extension in regard to this Motion.

2 **IT IS SO STIPULATED.**

3
4 Dated: June 29, 2023

5 **LITCHFIELD CAVO LLP**

6 By: /s/ Jamie S. Hendrickson, Esq.
7 MARISA A. POCCHI, ESQ.
8 Nevada Bar No. 10720
9 JAMIE S. HENDRICKSON, ESQ.
10 Nevada Bar No. 12770
11 3753 Howard Hughes Parkway, Suite 200
12 Las Vegas, NV 89169
13 T: (702) 949-3100
14 F: (702) 916-1776
15 Email: Pocci@LitchfieldCavo.com
16 Hendrickson@LitchfieldCavo.com
17 *Attorneys for Defendant Technical Chemical
18 Company*

Dated: June 29, 2023

CLIFF W. MARCEK, P.C.

By: /s/ Andrew J. Dupont
Cliff W. Marcek, Esq. (SBN 5061)
411 E. Bonneville Ave., Suite 300
Las Vegas, NV 89101
E: cwmarcek@nvlegaljustice.com

Andrew J. Dupont, Esq.

LOCKS LAW FIRM

The Curtis Center, Suite 720 East
601 Walnut Street
Philadelphia, PA 19106

*Attorneys for Plaintiff, Angela
Underwood, Individually and as Personal
Representative of the Estate of Tyler
Underwood*

Dated: June 29, 2023

MESSNER REEVES LLP

By: /s/ Jonathan Owens
Jonathan Owens, Esq. (SBN 7118)
8945 W. Russell Road, Suite 300
Las Vegas, NV 89148
*Attorneys for Defendant AutoZone Stores,
Inc.*

Dated: June 29, 2023

19 Dated: June 29, 2023
20 **GORDON REES SCULLY
21 MANSUKHANI, LLP**

By: /s/ Brian K. Walters
Brian K. Walters, Esq. (SBN 9711)
1 East Liberty Street, Suite 424
Reno, NV 89501
*Attorney for Defendant Sunnyside
Corporation*

**GORDON REES SCULLY
MANSUKHANI, LLP**

By: /s/ James E. Cavanaugh
Robert E. Schumacher, Esq. (SBN 9504)
James E. Cavanaugh, Esq. (SBN 6929)
300 S. 4th Street, Suite 1550
Las Vegas, NV 89101

*Attonreys for Defendant the Blaster
Corporation*

Dated: June 29, 2023

22 **EVANS FEARS & SCHUTTERT LLP**

23 By: /s/ Jay J. Schuttert
Jay J. Schuttert, Esq. (SBN 8656)
David W. Gutke, Esq. (SBN 9820)
Alexandria L. Layton, Esq. (SBN 14228)
6720 Via Austin Parkway, Suite 300
Las Vegas, NV 89119
*Attonreys for Defendant Calumet Branded
Products*

1 Dated: June 29, 2023

2 **MARIO VALENCIA**
3 **ATTORNEY AT LAW, LLC**

4 By: /s/ Justin D. Niznik

5 Mario D. Valencia, Esq. (SBN 6154)
6 40 S. Stephanie Street, Suite 201
Henderson, NV 89012

7 Justin D. Niznik, Esq.
8 **BOWMAN AND BROOKE LLP**
9 1064 Greenwood Blvd., Suite 212
Lake Mary, FL 32746
10 *Attorneys for Defendant W. M. Barr &*
Company, Inc.

11 Dated: June 30, 2023

12 **GORDEN REES SCULLY**
13 **MANSUKHANI, LLP**

14 By: /s/ Chad A. Harrison

15 Chad A. Harrison, Esq. (SBN 13888)
300 S. 4th Street, Suite 1550
Las Vegas, NV 89101

16 Theodore C. Yarbrough, Esq.
17 H. Barrett Marshall, Esq.
18 **GORDON REES SCULLY**
19 **MANSUKHANI, LLP**
20 2200 Ross Avenue, Suite 3700
Dallas, TX 75201
21 *Attorneys for Defendant Advance Stores*
Company, Inc.

Dated: June 29, 2023

KAEMPFER CROWELL

By: /s/ Joshua S. Snyder

Ryan M. Lower, Esq. (SBN 9108)
1980 Festival Plaza Dr., Suite 650
Las Vegas, NBV 89135

Kathy K. Condo, Esq.
Alexandra G. Farone, Esq.
Joshua S. Snyder, Esq.
BABST, CALLAND CLEMENTS AND
ZOMNIR, P.C.
Two Gateway Center
630 Stanwix St., 6th Floor
Pittsburgh, PA 15222
Attorneys for Defendant Amrep, Inc.

Dated: June 30, 2023

OLSON, CANNON, GORMLEY,
ANGULO & STOBERSKI

By: /s/ Michael E. Stoberski

Michael E. Stoberski, Esq. (SBN 4762)
9950 W. Cheyenne Avenue
Las Vegas, NV 89129

Attorneys for Defendants, CRC
Industrices, Inc., Illinois Tool Works,
Inc., Ashland, LLC, and Citgo Petroleum
Corporation

1 Dated: June 30, 2023

2 **RESNICK & LOUIS, P.C.**

3 By: /s/ Eleanor Deirdre Murphy

4 Kenneth Ching, Esq. (SBN 10542)
5 Adam McMillen, Esq. (SBN 10678)
6 Eleanor Deirdre Murphy, Esq. (SBN
7 15071)
8 Troy Clark Esq. (SNB 11361)
9 8925 West Russell Road, Suite 220
Las Vegas, NV 89148
*Attorneys for Defendant Highland Stores,
Inc.*

Dated: June 29, 2023

10 **ALVERSON TAYLOR & SANDERS**

11 By: /s/ Kurt R. Bonds

12 Kurt R. Bonds, Esq. (SBN 6228)
13 Vincent J. Garrido, Esq. (SBN 15918)
Charles Deskins, Esq. (SBN 15532)
14 6605 Grand Montecito Parkway, Suite 200
Las Vegas, NV 89149

15 *Attorneys for Defendants O'Reilly Auto
Enterprises, LLC and Tower Energy*

16 Dated: June 29, 2023

17 **RESNICK & LOUIS, P.C.**

18 By: /s/ Melissa J. Roose

19 Melissa J. Roose, Esq. (SBN 7889)
20 8925 West Russell Road, Suite 220
Las Vegas, NV 89148
*Attorneys for Defendants 7-Eleven, Inc and
Richard A. Haley.*

Dated: June 29, 2023

2 **RESNICK & LOUIS, P.C.**

3 By: /s/ Eleanor Deirdre Murphy

4 Troy Clark, Esq. (SBN 11361)
5 Kenneth Ching, Esq. (SBN 10542)
6 Eleanor Deirdre Murphy, Esq. (SBN
7 15071)
8 8925 West Russell Road, Suite 220
Las Vegas, NV 89148
*Attorneys for Defendant RM Markets,
Inc.*

Dated: June 29, 2023

10 **LEWIS BRISBOIS BISGAARD &
SMITH, LLP**

11 By: /s/ Steven Abbott

12 Darrell D. Dennis, Esq. (SBN 6618)
13 Steven Foremaster, Esq. (SBN 10650)
14 Steven Abbott, Esq. (SBN 10303)
6385 S. Rainbow Blvd., Suite 600
15 Las Vegas, NV 89118

16 Alexander Anolik, Esq.
Omar Nasar, Esq.,
HARRIS BEACH, PLLC
100 Wall Street
New York, NY 10005

17 *Attorneys for Defendant Safety-Kleen
Systems, Inc.*

ORDER

IT IS SO ORDERED that the deadline for TCC to file its Reply in support of TTC's Motion (ECF No. 322) is up to and including Monday, July 17, 2023.

Date: June 30, 2023.

United States District Court Judge